

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF)
CLIFF MANOR, INC.,)
INTEGRATED HEALTH SERVICES AT)
RIVERBEND,)
INTEGRATED HEALTH SERVICES AT)
SOMERSET VALLEY, INC.,)
ALPINE MANOR, INC.,)
BRIARCLIFF NURSING HOME, INC.,)
INTEGRATED HEALTH GROUP, INC.,)
SPRING CREEK OF IHS, INC.,)
FIRELANDS OF IHS, INC.,)
ELM CREEK OF IHS, INC.,)
IHS LONG TERM CARE SERVICES, INC.,)
ABE BRIARWOOD CORP.,)
JOHN DOES I THROUGH X,)
JOHN DOES I THROUGH Y,)

Plaintiffs-Counterclaim Defendants,)

v.)

THCI COMPANY LLC,)

Defendant-Counterclaim Plaintiff.)

NOTICE OF DEPOSITION

C.A. No. 04-910 (GMS)

To: Michael R. Lastowski
Duane Morris LLP
1100 North Market Street
Suite 1200
Wilmington, DE 19801

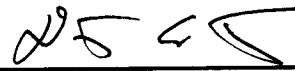
PLEASE TAKE NOTICE that pursuant to Rules 26, 30 and 45 of the Federal Rule of Civil Procedure, Defendant-Counterclaim Plaintiff THCI Company LLC, will take the deposition of Leonard Grunstein, upon oral examination, on January 26, 2006 at 10:00 a.m., or such other time as may be mutually agreed upon by the parties, at the offices of Arent Fox PLLC, 1675 Broadway, New York, New York 10019. The

deposition shall continue from day to day until completed.

Testimony at the deposition shall be taken before a notary public and shall be record by stenographic means. You are invited to attend and cross-examine.

Dated: Wilmington, Delaware
January 5, 2006

GREENBERG TRAURIG, LLP

By:  _____

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-and-

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THCI Company LLC*